



EX PARTE OR LATE FILED

Southern New England Telephone
227 Church Street
New Haven, Connecticut 06510
Tel 203. 771.8514
Fax 203. 624.3549
Email wendy.bluemling@SNET.com

Wendy Bluemling
Director - Regulatory Affairs

March 2, 1998

Ms. Rose Crellin
Enforcement Division
Common Carrier Bureau
Federal Communications Commission
2025 M Street / 6th Floor
Washington, D.C. 20554

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MAR - 3 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: EX PARTE
Flex ANI Waiver Requests / CC Docket No. 96-128
Pay Telephone Reclassification and Compensation
Provisions of the Telecommunications Act of 1996

Dear Ms. Crellin:

The Southern New England Telephone (SNET) is in the process of implementing the Flexible Automatic Number Identification (Flex ANI) feature in potential payphone line end offices. This implementation is in response to the Commission's Order¹ for access-dialed calls that requires local exchange carriers (LECs) to provide unique ANI II digits transmitted from payphone lines. SNET is planning to transmit "27" and "70" to Interexchange Carriers (ICs) that request Flex ANI and "27" and "07" for ICs that do not request these unique payphone coding digits.

During the installation and testing of the Flex ANI features, SNET's engineers have identified certain problems that will result in the delay of full implementation by March 9, 1998. This letter provides a summary of the problems SNET is currently aware of for the installation and testing process of Flex ANI.

¹ Order, Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, CC Docket No. 96-128, released October 7, 1997.

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1. 800 Traffic from a Nortel End Office

SNET is aware that a software patch is being developed by Nortel for 800 traffic that is routed from a Nortel End Office, Hartford (HRFRCT03DSO). All payphones including coin, coinless and dumb lines are impacted by this problem where the ANI II that is sent for all 800 type traffic is "00". As of January 23, 1998, no payphones were assigned to this End Office. SNET has been informed that the software patch will be available on March 13, 1998, and SNET will be scheduling the installation of the patch.

2. Flexible ANI Availability

Three of SNET's End Offices will not be capable of passing payphone-specific coding digits by March 9, 1998. The three End Offices; Hamden (HMDNCT00DS0), Guilford (GUFDCT00DS0), and Newtown (NWTWCT00DS0) are not on the correct base generic for the software patch that is required to provide Flex ANI to ICs without impacting all other ICs that do not elect to receive the Flex ANI digits. When Flex ANI is turned on, either all ICs receive the Flex ANI digits of "07" or "27" or it defaults to the ANI II digits of "00" for all ICs that want normal ANI II from payphone lines. This problem impacts a total of 13 payphone lines which affects all 1+ and 0+ calls

<u>End Office</u>	<u>Number of Payphone Lines Transmitting ANI II 07 *</u>	<u>Date of Flexible ANI Availability</u>
HMDNCT00DS0	10	June 23, 1998
GUFDCT00DS0	2	June 30, 1998
NWTWCT00DS0	1	July 13, 1998

* The line counts are as of January 23, 1998.

The switch vendor, Siemens, informed SNET that the software patch would not be available until mid-February 1998, and that a specific base generic was required. The availability of this software patch in February will allow SNET to offer Flex ANI for other End Offices that are on the correct base generic. It is not technically feasible for the switch vendor to install the correct base generic by March 9, 1998.

These three End Offices were scheduled for software upgrades based on the Local Number Portability requirements. Local Number Portability obligations for SNET's End Offices required a very precise schedule for software upgrades. It would be nearly impossible for SNET to reschedule the software upgrades for these three End Offices without endangering Local Number Portability.

3. 800 Tandem Traffic Where an IC
is Identified at the Tandem

A problem specific to the 800 Access Tandem offices, that are served by both Lucent and Nortel switches, has been identified. This problem affects all 800 type and 500 number calls made from dumb or coinless payphone lines where the IC is identified at the Tandem instead of at the End Office. All End Offices that subtend the 800 or 500 Access Tandems for carrier identification at the tandem are presently incapable of sending unique ANI II for these types of payphone calls. The tandem does not have the ability to send both Flex ANI and normal ANI II based on the IC's requirements. Therefore, when a database lookup is performed to determine the specific IC for an 800 type or 500 number service, the ANI II that is passed is "07". Although SNET is not able to measure the number of 800 calls from payphones, SNET estimates that this problem impacts approximately 3.5% of all payphones and 3% of all calls made from payphones. A potential solution for this problem is a software patch provided by the switch vendors. SNET is currently awaiting a response from both Nortel and Lucent regarding the availability and cost of such software.

4. 0- Transfer Transport

SNET has identified a problem with its 0- transfer calls affecting all 0- calls from coinless and dumb payphone lines. This constitutes approximately .5% of all payphone calls. The Operator Services Platform does not allow the ANI II digits to be changed from Flex ANI (sent by the End Office based on payphone identification) to standard ANI II if the IC elects not to receive Flex ANI on its 0- trunks. SNET will not forward Flex ANI codes to ICs unprepared or unwilling to accept Flex ANI. Coding digits of "07" must continue to be forwarded on coinless and dumb payphone lines until a vendor solution is provided. Thus, until a vendor solution is available, Flex ANI cannot be deployed on 0- trunks.

5. Feature Group B

A problem in SNET's Feature Group B trunks has also been identified affecting all 950 calling. This constitutes approximately .5% of all payphone calls. Flex ANI was developed for Feature Group D trunks and not Feature Group B. Neither ANI nor ANI II codes are sent on Feature Group B dialed calls. As a result, this prevents passage of all Flex ANI and standard ANI II digits including "27" on smart coin lines. SNET is not aware of any current industry standard available to resolve this problem.

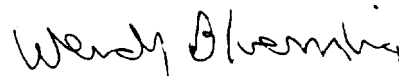
6. POTS Converted 800 Type Service

SNET is not aware of any industry standard currently available that would identify ANI II digits of "24" for these type of 800 payphone calls that are converted to a POTS (Plain Old Telephone Service) number. Approximately 1% of all payphone calls are affected by this problem.

SNET is progressing with the installation and testing of the Flex ANI features. The problems identified in this Petition are ones that SNET's engineers have identified at this point in the installation and testing process. Once industry standards are established for those problems where none currently exist, vendor solutions will be sought as to technical feasibility, availability and associated costs. Cost recovery options will be addressed at that time.

In light of the information provided, SNET respectfully seeks time to provide Flex ANI in a way that will provide the feature to the carriers who want it and not impact the carriers that do not want Flex ANI.

Sincerely,



Wendy Bluemling